

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address		FOR COURT USE ONLY	
ELIZABETH TORRES, SBN: 201677 CHOICE LAW GROUP 1004 WEST COVINA PARKWAY, #113 WEST COVINA, CA 91790 Tel.: 626.606.5000 Fax: 626.606.5753			
<input checked="" type="checkbox"/> Attorney for Movant(s) <input type="checkbox"/> Movant(s) appearing without an attorney			
UNITED STATES BANKRUPTCY COURT			
CENTRAL DISTRICT OF CALIFORNIA			
In re:		CASE NO.: 2:10-bk-53138 CHAPTER: 13	
Chavez, Jose Alfredo & Rosalinda		DECLARATION RE: ENTRY OF ORDER WITHOUT HEARING PURSUANT TO LBR 9013-1(o)	
		No hearing held	
Debtor(s)			

1. I am the ☐ Movant(s) or ☒ Attorney for Movant(s) or ☐ employed by Attorney for Movant(s)
2. **On: 4/18/2012** Movant(s) filed a motion entitled **Notice of Application and Application for Supplemental Fees**
3. A copy of the Motion and Notice is attached hereto.
4. **On: 4/18/2012**, Movant(s) served a copy of ☐ the Notice of Motion or ☒ the Motion and Notice of Motion on required parties using the method(s) identified on the Proof of Service of the notice of motion.
5. **Pursuant to LBR 9013-1(o), the Notice of Motion provides that the deadline for filing and serving a written response and request for a hearing is 14 days after the date of service of the Notice of Motion, plus 3 additional days if served by mail, electronically, or pursuant to F.R.Civ.P. 5(b)(2)(D), (E), or (F).**
6. **More than 27 days** have passed since Movant(s) served the Notice of Motion.
7. **I have checked the docket for this bankruptcy case and/or adversary proceeding, and no response and request for hearing has been timely filed.**
8. **No response and request for hearing has been timely served on Movant(s) at the street address, email address, or facsimile number specified in the Notice of Motion.**
9. Based upon the foregoing, pursuant to LBR 9013-1(o), a hearing is not required.
10. A proposed order on the Motion has been lodged concurrent with the filing of this declaration. A copy of the proposed order has been served upon the judge pursuant to LBR 5005-2(d) and the Court Manual, together with a LOU confirmation receipt if the order was lodged electronically. Pursuant to LBR 9021-1(b)(2) and the Court Manual, if self-addressed, stamped envelopes are required, they were also included with the proposed order.

WHEREFORE, Movant(s) requests that the Motion be granted and an order be entered without a hearing on the Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: June 14, 2012

Signature:

Printed Name: **ELIZABETH TORRES, Esq.**

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California
Page 1

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1004 WEST COVINA PARKWAY, #113, WEST COVINA, CA 91790

A true and correct copy of the foregoing document described as **DECLARATION RE: ENTRY OF ORDER WITHOUT HEARING PURSUANT TO LBR 9013-1(o)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") - Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

☐ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):

On **June 14, 2012**, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date June 14, 2012

Signature: _____

Printed Name: **Michael Rojano**

II. SERVED BY U.S. MAIL

Jose Alfredo Chavez
9514 Faywood Street
Bellflower, CA 90706

Rosalinda Chavez
9514 Faywood Street
Bellflower, CA 90706

ELIZABETH TORRES
Choice Law Group
1004 West Covina Parkway, #113
West Covina, CA 91790

Affiliated Accep Crp
Highway 5
Sunrise Beach, MO 65079

American Express
PO Box 0001
Los Angeles, CA 90096-0001

Asset Acceptance
PO Box 2036
Warren, MI 48090

Asset Acceptance LLC
P.O. Box 2036
Warren, MI 48090

Asset Acceptance LLC
P.O. Box 2036
Warren, MI 48090

Bac Home Loan Serv
450 American Street
Simi Valley, CA 93065

Bac Home Loan Serv
450 American Street
Simi Valley, CA 93065

Chase
PO Box 94014
Palatine, IL 60094

Citi
P.O. Box 6500
Sioux Falls, SD 57117

Citi
P.O. Box 6500
Sioux Falls, SD 57117

Employment Development Department
Bankruptcy Group MIC 92E
PO Box 826880
Sacramento, CA 94280-0001

Equable Ascent Financial, LLC
5 Revere Dr Ste 510
Northbrook, IL 60062

Franchise Tax Board
P.O. Box 942840
Sacramento, CA 94240-0002

Franchise Tax Board
P.O. Box 942840
Sacramento, CA 94240-0002

Franchise Tax Board
Attention Bankruptcy Unit
PO Box 2952
Sacramento, CA 95812-2952

GE Money Bank / JC Penney
P.O. Box 984100
El Paso, TX 79998

Gemb/Lowes
PO Box 103065
Roswell, GA 30076

Gemb/Old Navy
P.O. Box 981400
El Paso, TX 79998

GEMB/Walmart
P.O. Box 103027
Roswell, GA 30076

INternal REvenue Service
Internal Revenue Service
Ogden, UT 84201-0025

Internal Revenue Service
P.O. Box 21126
Philadelphia, PA 19114

Internal Revenue Service
300 N. Los Angeles St.
Stop 5117
Los Angeles, CA 90012

Internal Revenue Service
Insolvency 1 Stop 5022
300 N. Los Angeles Street, Rm 4062
Los Angeles, CA 90012-9903

INternal REvenue Service
Internal Revenue Service
Ogden, UT 84201-0025

Kohl's / Chase
N. 56 W. 17000 Ridgewood Dr.
Menomonee Falls, WI 53051

Law Offices of Patenaude & Felix
4545 Murphy Canyon Road, 3rd Floor
San Diego, CA 92123

LVNV Funding
PO Box 65250
Salt Lake City, UT 84165

LVNV Funding
PO Box 65250
Salt Lake City, UT 84165

LVNV Funding LLC
PO BOX 390846
Minneapolis, MN 55439

LVNV Funding LLC
PO BOX 390846
Minneapolis, MN 55439

LVNV Funding LLC
PO BOX 390846
Minneapolis, MN 55439

Nissan Infinity
PO Box 660360
Dallas, TX 75266

NORDSTROM
PO BOX 981400
El Paso, TX 79998

Professional Collection
P.O. Box 45274
Los Angeles, CA 90045

Sears
PO Box 6937
The Lakes, NV 88901

Securities Exchange Commission
5670 Wilshire Boulevard, 11th Floor
Los Angeles, CA 90036

Superior Court of California
County of Los Angeles
Case Number: 08C03187
10025 E. Flower Street
Bellflower, CA 90706

Target
PO Box 59317
Minneapolis, MN 55459-0317

THD/CBSD
P.O. Box 6003
Hagerstown, MD 21747

United States Trustee
725 South Figueroa Street, 26th Flr
Los Angeles, CA 90017

Victoria's Secrets
PO Box 182128
Columbus, OH 43218

WELLS FARGO
PO BOX 3908
Portland, OR 97208

World Finance Corp.
741D Hwy 51 N Covington
Covington, TN 38019

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email TORRES LAW GROUP ELIZABETH TORRES, ESQ. (SBN: 201677) 1004 WEST COVINA PARKWAY, #113 WEST COVINA, CA 91790 TELEPHONE: 626.606.5000 FACSIMILE: 626.606.5753 Attorneys for Chavez, Jose Alfredo & Rosalinda Debtor(s) appearing without an attorney	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: Chavez, Jose Alfredo & Rosalinda Debtor(s) .	CASE NO.: 2:10-bk-53138 CHAPTER: 13 NOTICE OF MOTION FOR ORDER WITHOUT HEARING PURSUANT TO LBR 9013-1(o) [No hearing unless requested in writing]

TO THE U.S. TRUSTEE AND ALL PARTIES IN INTEREST. PLEASE TAKE NOTICE THAT:

1. Movant(s) Chavez, Jose Alfredo & Rosalinda, has filed a motion entitled Notice of Application for Supplemental Fees; Trustee's Recommendation.
2. Movant(s) is requesting that the court grant the motion without a hearing, as provided for in LBR 9013-1(o).
3. The motion is based upon the legal and factual grounds set forth in the Motion and briefly described in the attached description of relief sought. (Check appropriate box below):

☒ The full motion is attached hereto; or
The full motion has been filed with the court, and a detailed description of the relief sought is attached hereto
4. **DEADLINE FOR FILING AND SERVING OPPOSITION PAPERS AND REQUEST FOR A HEARING:** Pursuant to LBR 9013-1(o), any party objecting to the motion may request a hearing on the motion. The deadline for filing and serving a written opposition and request for a hearing is 14 days after the date of service of this notice, plus 3 additional days if you were served by mail, electronically, or pursuant to F.R.Civ.P.5(b)(2)(D), (E), or (F). If you fail to comply with this deadline, the court may treat such failure as a waiver of your right to oppose the motion and may grant the motion without further hearing and notice.

Dated: April 18, 2012

Respectfully submitted,

By: _____

Signature of Movant or attorney for Movant

Name: ELIZABETH TORRES, ESQ.

Type Name of Movant or attorney for Movant

1 TORRES LAW GROUP
2 ELIZABETH TORRES, ESQ. (SBN: 201677)
3 1004 WEST COVINA PARKWAY, #113
4 WEST COVINA, CA 91790
5 TELEPHONE: 626.606.5000
6 FACSIMILE: 626.606.5753

7 Attorneys for Chavez, Jose Alfredo & Rosalinda

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **LOS ANGELES DIVISION**

11 In re:

Case No. 2:10-bk-53138

Chapter 13

12 Chavez, Jose Alfredo & Rosalinda

**NOTICE OF APPLICATION AND
APPLICATION FOR SUPPLEMENTAL
FEES; TRUSTEE'S RECOMMENDATION**

13 Debtor(s),
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22 **TO THE HONORABLE BANKRUPTCY JUDGE: Sandra R. Klein**
23

24 Applicant is counsel of record for the above-named Debtor(s) who is under a
25 confirmed Chapter 13 Plan. Fees were awarded for confirmation in the amount of
26 \$4000.00. Since confirmation of said Plan, Supplemental fees have been awarded as
27 follows \$1450.00 Total fees awarded to date including Confirmation fees and
28

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1004 W. Covina Parkway, Suite 113
West Covina, CA 91790

1 supplemental fees is \$5450.00. Applicant has performed certain extraordinary services
2 at the request of the Debtor(s) attached as Exhibit "A" and Exhibit "C." Additionally,
3 Applicant has provided an itemized list of expenses attached as Exhibit "B."

4 The reasonable value of said services is \$2762.50 (Fees) + \$160.02 (Costs), of
5 which \$0.00 has been paid. **WHEREFORE**, your Applicant prays that an allowance be
6 made in the sum of \$2922.52.

7 **DEADLINE** for Filing Opposition Papers:

8 Pursuant to Local Bankruptcy Rule 9013-l(o) (l) any opposition to this
9 Motion/Application must be filed and served on Debtor(s) and Debtors' counsel within
10 fourteen (14) days of the date of service hereof. Any party objecting to Debtor(s)
11 Motion/Application may file and serve a written objection and request a hearing on this
12 Motion. If you fail to file a written response, the Court may treat such a failure as a
13 waiver of your right to oppose this Motion/Application and may grant the requested
14 relief.

15 Date: April 18, 2012

16 By:

17 
18 ELIZABETH TORRES, Esq.
19 Attorney for Debtor
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	FOR COURT USE ONLY
Chapter 13 Trustee	
In re: Debtor(s).	CHAPTER 13 CASE NUMBER TRUSTEE'S COMMENTS ON OR OBJECTION TO APPLICATION FOR SUPPLEMENTAL FEES (No Hearing Required)

The undersigned Chapter 13 Trustee, having reviewed the Application for Supplemental Fees (the "Application") filed on _____ as docket entry number _____, provides the following response to the Application:

☐ RECOMMENDED

☐ RECOMMENDED on the following conditions:

_____ ☐ See attached sheet.

☐ NOT RECOMMENDED for the following reasons:

_____ ☐ See attached sheet.

☐ NO POSITION TAKEN BY THE CHAPTER 13 TRUSTEE

☐ SET FOR HEARING.

Dated: _____

Chapter 13 Trustee

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West Covina, CA 91790

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EXHIBIT "A"

**DECLARATION OF ELIZABETH TORRES IN SUPPORT OF
SUPPLEMENTAL FEE APPLICATION FOR CASE NUMBER 2:10-bk-53138**

I, ELIZABETH TORRES, declare as follows:

1. I am an attorney at law, licensed to practice before the United States Bankruptcy Court for the Central District of California. My office is located at 1004 West Covina Parkway, Suite 113, West Covina, CA 91790.
2. I have personal knowledge of the matters set forth hereinafter, and I would and could competently testify thereto as a witness.
3. I was admitted to the State Bar of California in 1999 and have been practicing law for over 12 years. My experience in the bankruptcy field provides me with the ability to provide my clients with professional legal representation.
4. I am the attorney for the Debtor(s) herein. I was retained by the Debtor(s) to perform the following reasonable and necessary services in the instant bankruptcy proceeding: Preparing Adversary Proceeding to Avoid Lien.
5. To date, I performed the following services in connection with the "Adversary Proceeding to Avoid Lien": attached hereto as Exhibit "B" is a true and correct copy of my "Cost" statement. To date, billable hours of attorney work are 8.5 hours and 0 in billable hours of paralegal work.
6. Based on 8.5 Attorney billable hours of attorney work and 0 in billable hours of paralegal work in connection with the Adversary Proceeding to Avoid Lien,

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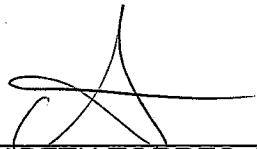
1 the fees incurred are \$2762.50 and the costs incurred are \$160.02. (itemized
2 fees and costs attached hereto as exhibit "B") I am requesting a total of
3 \$2922.52 to be approved in the instant Supplemental Fee Application. I have
4 received \$0.00 to date for these services.

- 5
6 7. I bill my time out at \$325.00 per hour, which rate is in line with other attorneys
7 with similar experience and expertise in the Central District of California.
8

9 I declare under penalty of perjury that the foregoing is true and correct and that
10 this Declaration was executed on April 18, 2012, in West Covina, California.
11

12
13 Date: April 18, 2012

14 By:

15 
16 ELIZABETH TORRES, Esq.
17 Attorney for Debtor(s)
18 TORRES LAW GROUP
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EXHIBIT "B"

**ADDENDUM TO APPLICATION FOR ATTORNEY FEES
Itemization of Administrative Costs**

Rates **Total**

Attorney	\$325 p/h	<input checked="" type="checkbox"/>	8.5 hrs	\$2762.50
Paralegal/Word Processing	\$95 p/h	<input checked="" type="checkbox"/>	0 hrs	\$0

Document Preparation

Photocopies and Facsimilies:

<u>Description</u>	<u>Page Count</u>	<u>Copies Made</u>	<u>Total</u>	<u>Costs</u>	<u>Total</u>
Adversary Proceeding to Avoid Lien	<u>45</u> Pgs x	<u>11</u> Copies =	<u>495</u>	pgs x \$0.20 p/pg =	<u>\$99.00</u>
App for Fees	<u>15</u> Pgs x	<u>5</u> Copies =	<u>75</u>	pgs x \$0.20 p/pg =	<u>\$15.00</u>
Fax	<u>0</u> Pgs x	Pages =	<u>0</u>	pgs x \$0.20 p/pg =	<u>\$0</u>

Postage:

Mailing of Adversary Proceeding to Avoid Lien	@ \$2.07	<u>\$22.77</u>
Certified Mail for Adversary Proceeding to Avoid Lien	@ \$2.85	<u>\$19.95</u>
Mailing of Fee Application	@ \$0.66	<u>\$3.30</u>

Miscellaneous Costs:

Courier	<u>\$0</u>
Overnight Delivery	<u>\$0</u>
Appraisal Report	<u>\$0</u>
Translation Services	<u>\$0</u>

Total Administrative Costs: \$160.02

Date: April 18, 2012

By:


ELIZABETH TORRES, Esq.
Attorney for Debtor(s)
TORRES LAW GROUP

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1004 W. Covina Parkway,
West Covina, CA 91790

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EXHIBIT "C"

Date	DESCRIPTION	Attorney Hours	Paralegal Hours	Attorney Rate	Paralegal Rate	Cost	Staff	Activity
10/20/2010	Conference with Debtor(s) re Adversary Proceeding to Avoid the Junior Lien on Debtor(s) Real Property, basis for Proceeding being filed, possibility of resolving matter, procedural requirements by Judge, and deadline for Junior Lienholder to file response.	0.5		325.00	95.00	162.50	NVH	Meeting
10/21/2010	Requested copies of Deed of Trust(s), Grant Deed(s) and Mortgage Statement(s), showing the loan information balance and property address from Debtor(s) for all liens against the property.	0.2		325.00	95.00	19.00	NVH	Call
10/21/2010	Research Lender(s) information, including Corporate Officers to Serve the Complaint — Lender(s) website(s), FDIC, Secretary of State of State of Incorporation, and Claims Registry.	0.2		325.00	95.00	65.00	NVH	Preparation
10/22/2010	Contact Title Company to Research information on the Real Property	0.1		325.00	95.00	32.50	NVH	Preparation
10/25/2010	Reviewed Copy of Title Report, Reviewed Dates of all Deed of Trust(s) to confirm priority status of Lienholder(s).	0.2		325.00	95.00	65.00	NVH	Review
10/26/2010	Drafted Adversary Complaint for Declaratory Relief on Junior Lien	0.5		325.00	95.00	162.50	NVH	Preparation
10/27/2010	Reviewed Adversary Complaint, Edited, and Filed	0.2		325.00	95.00	65.00	NVH	Review
10/27/2010	Draft Summons and Notice of Status Conference, complete and select the correct court address.	0.2		325.00	95.00	65.00	NVH	Preparation
10/28/2010	Reviewed Summons and notice of Status Conference.	0.1		325.00	95.00	32.50	NVH	Review
10/29/2010	Prepared electronic filing declaration, converted Adversary Proceeding, Exhibits, and electronic filing declaration to pdf document. Electronically filed Adversary Proceeding (Complaint, Summons and Cover Sheet).	0.3		325.00	95.00	97.50	NVH	Preparation/ Filing

Nathan V. Hoffman, Esq. = NVH, Spyros Osorio, Esq. = SO, Elizabeth Torres, Esq. = ET, Cynthia Grande, Esq. = CG, Zachary I. Gonzalez, Paralegal = ZIG, Maria F. Torres, Paralegal = MT, Eunice E. Diaz, Paralegal = EED, Andrea Chavez, Paralegal = ACH.

10/29/2010	Completed the Proof of Service, with Certified Mailing for all Interested Parties	0.2		325.00	95.00	65.00	NVH	Preparation
10/29/2010	Printed Judge's Copy, and Served all Interested Parties	0.2		325.00	95.00	65.00	NVH	Preparation
11/1/2010	Telephone conference with Debtor re Status of Adversary Proceeding.	0.5		325.00	95.00	162.50	NVH	Call
2/10/2011	Prior to the Status Conference, Draft Unilateral Status Report (Defendant has not Responded).	0.2		325.00	95.00	65.00	NVH	Preparation
2/10/2011	Reviewed Status Report and E-filed Status Report for Adversary Proceeding against "Junior Lienholder"	0.2		325.00	95.00	65.00	NVH	Filing
2/18/2011	Attended Status Conference an Requested Entry for Default (Defendant has not Responded). Default Hearing Date Issued by Judge	1		325.00	95.00	325.00	NVH	Hearing
3/10/2011	Drafted Motion for Default Judgment, Revised, Converted to PDF and E-filed with ECF	0.3		325.00	95.00	97.50	NVH	Preparation/ Filing
3/10/2011	Drafted Order for Default Judgment	0.2		325.00	95.00	65.00	CG	Preparation
3/11/2011	Reviewed Proposed Order, made Revisions and Prepared for E-filing	0.2		325.00	95.00	65.00	CG	Review
3/14/2011	Upload the Order for Default Judgment to Adversary Proceeding.	0.1		325.00	95.00	32.50	CG	Filing
4/9/2011	Telephone conference with Debtor re Status of Adversary Proceeding.	0.5		325.00	95.00	162.50	NVH	Call
4/21/2011	Telephone conference with movant Jessica @ Realtime Resolutions, discussed possible stipulation on extension of time to allow to oppose adversary proceeding	0.2		325.00	95.00	65.00	CG	Call
4/25/2011	Telephone conference with Cynthia Allman- Assistant to V.P regarding a possible stipulation regarding the Adversary Proceeding.	0.2		325.00	95.00	65.00	CG	Call
4/26/2011	Researched and reviewed Judges website for Stipulated Judgment format, prepared Stipulated Judgment and forward to attorney for Movant	0.3		325.00	95.00	97.50	CG	Review

Nathan V. Hoffman, Esq. = NVH, Spyros Osorio, Esq. = SO, Elizabeth Torres, Esq. = ET, Cynthia Grande, Esq. = CG, Zachary I. Gonzalez, Paralegal = ZIG, Maria F. Torres, Paralegal = MT, Eunice E. Diaz, Paralegal = EED, Andrea Chavez, Paralegal = ACH.

4/26/2011	Received corrected Stipulated Judgment signed forward to Movant's attorney	0.3		325.00	95.00	97.50	CG	Review
4/27/2011	Upload the stipulation re Adversary Proceeding.	0.1		325.00	95.00	32.50	CG	Filing
5/17/2011	Attended confirmation hearing and TEE requested a continuance to June 29, 2011 due to stipulation yet to be signed.	1		325.00	95.00	325.00	CG	Meeting
7/13/2011	Received Stipulated Judgment signed by Judge, forward to Movant's attorney	0.3		325.00	95.00	97.50	CG	Review
		8.5			Total	2,762.50		

Nathan V. Hoffman, Esq. = NVH, Spyros Osorio, Esq. = SO, Elizabeth Torres, Esq. = ET, Cynthia Grande, Esq. = CG, Zachary I. Gonzalez, Paralegal = ZIG, Maria F. Torres, Paralegal = MT, Eunice E. Diaz, Paralegal = EED, Andrea Chavez, Paralegal = ACH.

Choice Law Group,
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West Covina, CA 91790

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EXHIBIT "D"



**Nathan V.
Hoffman**

3350 Wilshire Boulevard
Suite 855
Los Angeles, California
90010

Phone: (213) 383-5721
Fax: (213) 383-5722
Email: visa_atty@yahoo.com

Education

Legal

Loyola Law School - Los Angeles, California

J.D.: June 1985

Licensed in the States of California, Texas, and the District of Columbia

Practice includes State and Federal District Court proceedings in Central District California; Bankruptcy and Immigration Courts since 1988.

Undergraduate

The American University - Washington, D.C.

B.S. *Cum Laude*: Political Science & Economics, May 1982

University of London, School of Economics & Government, 1981

**Professional
experience**

1989 – Present: **Law Offices of Hoffman & Osorio**, Los Angeles, CA

2009 – Present: **Choice Law Group**, El Monte, CA

- Bankruptcy (Chapter 7, 11, and 13 filings); Plaintiff Personal Injury; Real Estate; Contracts; Immigration; Civil & Business Litigation; Family Law; and Juvenile Dependency & Delinquency law.
- Contract clients include a Multi-Media Marketing company; Consumer Products manufacturer; Private Bullion Bank & Trust; Foreign Vitamin manufacturer; Cellular Communications Limited Liability Partnership; Construction/Architecture firm; Oil Exploration company; and Home Health Care agency.
- Residential and Commercial Loan Modification Agreements; Joint Venture Agreements, Non-Circumvention, Non-Disclosure and Confidentiality Agreements, Real Estate Short Sale Agreements, Royalty Agreements, Irrevocable Master Fee Protection Agreements, Commission Agreements, Distribution and Licensing Agreements, AIA Design-Build Contracts, and other Professional Service & General contracts.

1987 – 1989: **Law Offices of Barry J. Simon**, Marina Del Rey, CA

- Products Liability; Personal Injury; Contracts; Probate;

1986 – 1987: **Law Offices of Jeffrey G. Balkin**, Los Angeles, CA

- Tax Law (State & Federal); Commercial Litigation, Real Property, Contracts, and International Business Law

1985 – 1986: **Bronson, Bronson & McKinnon**, Los Angeles, CA

- Insurance Defense; Contracts, Tax; Corporate Law.

Professional
memberships

Juvenile Courts Bar Association, President 2001, Exec. Director 2002

Los Angeles County Bar Association

American Immigration Lawyers Association, (AILA)

California Consumer Attorneys of Los Angeles

Professional References Available Upon Request.

CYNTHIA E. GRANDE

EXPERIENCE

Choice Law Group, LLP, Los Angeles, California

Associate Attorney, March 2011 – present

- Advise clients on a variety of legal issues with an emphasis on bankruptcy and family law.
- Draft and review motions, applications or other moving papers prior to filing.
- Appear for 341(a) meeting of creditors, mediations, hearings on motions, orders to show cause, and confirmations.
- Negotiate with creditor attorneys and trustees to achieve successful resolutions for debtors.

Self-Employed, Sacramento, California

Attorney at Law, November 2010 – February 2011

- Contract attorney focused primarily on criminal defense, including: traffic infractions, DUIs, expungements misdemeanors, and felonies.
- Completed *Kellett* and 1538.5 motions as a part of client representation.
- Handled cases in multiple jurisdictions to completion.

Brennan Wise Law Group, LLP, Sacramento, California

Attorney, December 2009 – October 2010

- Appeared regularly in Superior Court on criminal cases in multiple jurisdictions and negotiated with the District Attorney's office.
- Researched and wrote memoranda on various issues, including: illegal search and seizure, juror misconduct, and admissibility of evidence.
- Conducted trial preparation on felony cases, such as: assault, second degree murder, and first degree murder charges; independently handled several bench trials for traffic infractions and civil restraining orders.

Sacramento City Attorney's Office, Sacramento, California

Law Clerk, September 2009 – November 2009

- Provided analysis of validity of City Code sections as they pertained to on-street parking and its relation to the Unruh Civil Rights Act, California Civil Code, and Americans with Disabilities Act.
- Researched the legislative history for the Americans with Disability Act and the level of applicability to public buildings built prior to the creation of the law.
- Drafted a motion for summary judgment on a contract claim against the City of Sacramento.

Victims of Crime Resource Center, Sacramento, California

Law Clerk/Victim Counselor, August 2007 – May 2009

- Counseled clients and discussed potential resources with them based on what type of assistance they could receive as a result of the crimes committed against them.
- Researched case law and relevant statutes as needed, including: Megan's Law, small claims, and identity theft.
- Maintained statewide database of California resources available for clients.

Sacramento County District Attorney's Office, Sacramento, California

Legal Intern, January 2008 – May 2008, August 2008 – December 2008

- Trained interns on office protocol, court procedure, and case strategies.
- Drafted and argued 1538.5 motions in court, which included direct and cross-examination of witnesses; handled arraignments, created offers for defendants, and argued bail motions in Superior Court.
- Researched and wrote an appellate brief for a DUI conviction.

Cynthia E. Grande • Resume • Page 2 of 2

National Naval Medical Center, Washington, D.C.

Legal Intern, May 2008 – August 2008

- Prepared answers to legal issues arising in a research and teaching hospital through research and written memoranda, involving: patient rights, medical ethics, and administrative law.
- Edited and developed existing NPMC protocol to comply with changes in federal law.
- Created “end-of-life” and “do not resuscitate” guidelines for hospital providers and staff.

Immigration Law Offices of Curtis F. Pierce, Los Angeles, California

Legal Assistant/Paralegal, January 2005 – May 2006

- Interviewed clients and prepared them for immigration interviews and court appearances involving adjustment of status, asylum, and cancellation of removal cases.
- Worked with attorney to manage busy caseload, including: scheduling, deadlines, and updating client data.
- Edited legal documents for submission to various courts, including the Ninth Circuit Court of Appeals.

MTV Networks, Santa Monica, California

Casting Intern, June 2004 – August 2004

- Managed special projects, including promotions, marketing, and recruitment of potential cast members.
- Communicated with other departments in the U.S. to coordinate various teams for production.
- Created and maintained data and word documents, including spreadsheet and database programs.

EDUCATION

University of the Pacific, McGeorge School of Law, Sacramento, California

Juris Doctor, May 2009

- Honors, Trial Advocacy (2009); WLS Virginia Mueller Bar Scholarship (2009); La Raza Unity Bar Scholarship (2008); McGeorge Health/Elder Law Fellowship (2008); National Latino Peace Officers Association Academic Award (2007); Latino Law Student Association, Secretary (2007-2008), Member (2006-2009); Witkin Award, highest grade in Principles of Agency (2007)

University of Southern California, Los Angeles, California

Bachelor of Arts in Political Science & Bachelor of Arts in Social Sciences with Psychology Emphasis, May 2006

- Sigma Lambda Gamma National Sorority, Inc. - President (2005), Program Development Vice-President (2004), Marketing Vice-President (2004), Operations Vice-President (2003); Latino Business Student Association -Treasurer (2004), Operations Director (2004), Secretary (2003); SALEF Summer Leadership Program – Fellow (2003); USC Joint Educational Project – Volunteer (2003-2004)

SPECIALIZED SKILLS

Fluent in Spanish (written and verbal).

MEMBERSHIPS

State Bar of California – December 2009 – present

United States District Court, Central District of California – March 2011 – present

Mexican-American Bar Association – March 2011 – present

American Bar Association – December 2009 – present

Hispanic National Bar Association – December 2009 – present

COMMUNITY SERVICE

- Trojan Junior Auxiliary, Member (2011); Community Lawyers, Inc., Volunteer (2011); New Leaders Council, Fellow (2011); Sacramento County Bar Association-Food From the Bar Committee, (2010); Sigma Lambda Gamma-Sacramento State University, Alumna Advisor/Mentor (2007 – 2011)

NOTE: When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category I. Proposed orders do not generate an NEF because only orders that have been entered are placed on a CM/ECF docket.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1004 West Covina Parkway Suite 113, West Covina, CA 91790

A true and correct copy of the foregoing document described as **NOTICE OF MOTION FOR ORDER WITHOUT HEARING and APPLICATION AND APPLICATION FOR SUPPLEMENTAL FEES** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d), and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") - Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addressed indicated below:

☐ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):
On April 18, 2012 I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follow. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

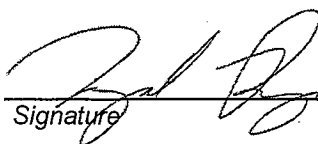
☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 18, 2012
Date

Michael Rojano
Type Name

Signature



II. SERVED BY U.S. MAIL

Jose Alfredo Chavez
9514 Faywood Street
Bellflower, CA 90706

Rosalinda Chavez
9514 Faywood Street
Bellflower, CA 90706

ELIZABETH TORRES
Choice Law Group
1004 West Covina Parkway, #113
West Covina, CA 91790

Affiliated Accep Crp
Highway 5
Sunrise Beach, MO 65079

American Express
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Los Angeles, CA 90096-0001

Asset Acceptance
PO Box 2036
Warren, MI 48090

Asset Acceptance LLC
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Warren, MI 48090

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P.O. Box 2036
Warren, MI 48090

Bac Home Loan Serv
450 American Street
Simi Valley, CA 93065

Bac Home Loan Serv
450 American Street
Simi Valley, CA 93065

Chase
PO Box 94014
Palatine, IL 60094

Citi
P.O. Box 6500
Sioux Falls, SD 57117

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Sioux Falls, SD 57117

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Bankruptcy Group MIC 92E
PO Box 826880
Sacramento, CA 94280-0001

Equable Ascent Financial, LLC
5 Revere Dr Ste 510
Northbrook, IL 60062

Franchise Tax Board
P.O. Box 942840
Sacramento, CA 94240-0002

Franchise Tax Board
P.O. Box 942840
Sacramento, CA 94240-0002

Franchise Tax Board
Attention Bankruptcy Unit
PO Box 2952
Sacramento, CA 95812-2952

GE Money Bank / JC Penney
P.O. Box 984100
El Paso, TX 79998

Gemb/Lowes
PO Box 103065
Roswell, GA 30076

Gemb/Old Navy
P.O. Box 981400
El Paso, TX 79998

GEMB/Walmart
P.O. Box 103027
Roswell, GA 30076

Internal REvenue Service
Internal Revenue Service
Ogden, UT 84201-0025

Internal Revenue Service
P.O. Box 21126
Philadelphia, PA 19114

Internal Revenue Service
300 N. Los Angeles St.
Stop 5117
Los Angeles, CA 90012

Internal Revenue Service
Insolvency 1 Stop 5022
300 N. Los Angeles Street, Rm 4062
Los Angeles, CA 90012-9903

Internal REvenue Service
Internal Revenue Service
Ogden, UT 84201-0025

Kohl's / Chase
N. 56 W. 17000 Ridgewood Dr.
Menomonee Falls, WI 53051

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El Paso, TX 79998

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P.O. Box 45274
Los Angeles, CA 90045

Sears
PO Box 6937
The Lakes, NV 88901

Securities Exchange Commission
5670 Wilshire Boulevard, 11th Floor
Los Angeles, CA 90036

Superior Court of California
County of Los Angeles
Case Number: 08C03187
10025 E. Flower Street
Bellflower, CA 90706

Target
PO Box 59317
Minneapolis, MN 55459-0317

THD/CBSD
P.O. Box 6003
Hagerstown, MD 21747

United States Trustee
725 South Figueroa Street, 26th Flr
Los Angeles, CA 90017

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PO Box 182128
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